

2002 DEC 31 A 10:52

Citizens Telecommunications Company)
of Illinois and Level 3 Communications, LLC)
Joint Petition for Approval of Interconnection)
Agreement pursuant to 47 U.S.C. § 252.)

Docket No. 02- CHIEF CLERK'S OFFICE
0869

**JOINT PETITION FOR APPROVAL OF
INTERCONNECTION AGREEMENT BETWEEN
CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS
AND LEVEL 3 COMMUNICATIONS, LLC**

Citizens Telecommunications Company of Illinois ("Citizens") and Level 3 Communications, LLC ("Level 3") hereby request that the Illinois Commerce Commission (the "Commission") review and approve the attached Agreement for Interconnection between Citizens Telecommunications Company of Illinois and Level 3 Communications, LLC (the "Agreement"), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the "Act"). In support thereof, the parties state as follows:

1. The Agreement was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act.

2. Pursuant to § 252(e) of the Act, the Commission may only reject a negotiated agreement if it finds that (1) the Agreement discriminates against another carrier, or (2) implementation of the Agreement would not be consistent with public interest, convenience, and necessity. Neither basis for rejection is present here.

3. As set forth in the attached Verification of David Ruhland, Citizens will make the Agreement available to any other telecommunications carrier operating within its territory.

Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

5. Copies of the Agreement are available for public inspection in Citizens' and Level 3's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Level 3 Communications, LLC respectfully request that the Commission approve the attached Local Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS
COMPANY OF ILLINOIS**

LEVEL 3 COMMUNICATIONS, LLC

By: 

David Ruhland

By: _____

Michelle Krezek

Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

5. Copies of the Agreement are available for public inspection in Citizens' and Level 3's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Level 3 Communications, LLC respectfully request that the Commission approve the attached Local Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

**CITIZENS TELECOMMUNICATIONS
COMPANY OF ILLINOIS**

LEVEL 3 COMMUNICATIONS, LLC

By: _____

David Ruhland

By: Michelle Krezek

Michelle Krezek

VERIFICATION

I, David Ruhland do on oath depose and state that that I am a Regulatory Manager for Citizens Telecommunications Company of Illinois, that I have read the foregoing Statement in Support of Joint Petition for Approval of Interconnection Agreement and the Joint Petition for Approval of Agreement for Local Interconnection and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.



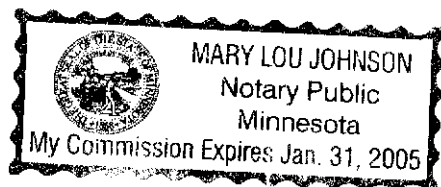
David Ruhland

SIGNED AND SWORN TO BEFORE ME THIS 5 DAY OF

December, 2002.



NOTARY PUBLIC



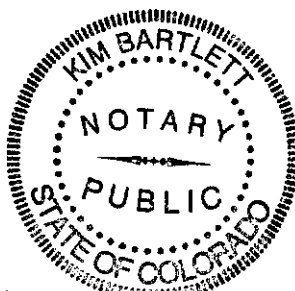
VERIFICATION

I, Michelle Krezek, do on oath depose and state that that I am the ^{Director,} Interconnection ^{Services} for Level 3 Communications, LLC, that I have read the foregoing Petition and that I know the contents thereof, an that the same is true and correct to the best of my knowledge, information and belief.

Michelle Krezek
Michelle Krezek

SIGNED AND SWORN TO BEFORE ME THIS 5th DAY OF
December, 2002.

Kim Bartlett
NOTARY PUBLIC



My commission expires 9.30.06

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Citizens Telecommunications Company)	
of Illinois and Level 3 Communications, LLC)	
)	Docket No. 02-
Joint Petition for Approval of Interconnection)	
Agreement pursuant to 47 U.S.C. § 252.)	

**STATEMENT IN SUPPORT OF JOINT PETITION
FOR APPROVAL OF INTERCONNECTION AGREEMENT**

1. I, David Ruhland, am a regulatory manager for Citizens Telecommunications Company of Illinois ("Citizens"), and submit this Statement in Support of the Joint Petition for Approval of the Interconnection Agreement between Citizens and Level 3 Communications, LLC ("Level 3").

2. The attached Agreement for Local Interconnection (the "Agreement") between Citizens and Level 3 was reached through voluntary negotiations between the parties. Accordingly, Citizens and Level 3 request the approval of the Agreement by the Illinois Commerce Commission (the "Commission") pursuant to § 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (the "Act").

3. Under § 252(e)(1) and (2) of the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof "discriminates against a telecommunications carrier not a party to the agreement" or "...implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity." Because the Agreement is the product of voluntary negotiations, it does not have to comply with the standards set forth in § 252(d).

4. The Agreement is not discriminatory. Citizens will make this Agreement available to any other telecommunication's carrier who requests it and is operating within Citizens' service

territory. Other telecommunications' carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

5. The Agreement is the product of good faith, arms-length negotiations between competitors. Overall, the Agreement is acceptable to both parties and it shows that two competitors, negotiating in good faith under the terms of the Act, can arrive at a mutually beneficial business arrangement that overall meets their individual business interests and furthers the cause of competition in the local exchange market. This is precisely the process Congress envisioned in crafting the Act. See S. Rep. No. 23, 104th Cong., 1st Sess. at p. 19. ("The Committee intends to encourage private negotiation of interconnection agreement.") (The Conference Committee on the Telecommunications Act of 1996 receded to the Senate on § 252(a) and (b), see Joint Explanatory Statement of the Committee of Conference at p. 125.)

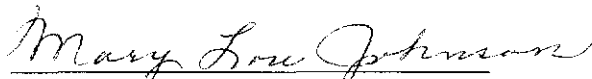
6. The Agreement is consistent with the public interest, convenience and necessity; meets all the requirements of the Act and the Commission should approve it.

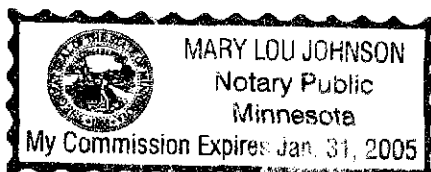


David Ruhland

Subscribed and sworn to before me

this 5 day of December, 2002.


Notary Public



STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Citizens Telecommunications Company)	
of Illinois and Level 3 Communications, LLC)	
)	Docket No. 02-
Joint Petition for Approval of Agreement for)	
Local Interconnection, pursuant to)	
47 U.S.C. § 252.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that we have on this 30th day of December 2002, filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Joint Petition for Approval of the Interconnection Agreement between Citizens Telecommunications Company of Illinois and Level 3 Communications, LLC, a copy of which is hereby served upon you.

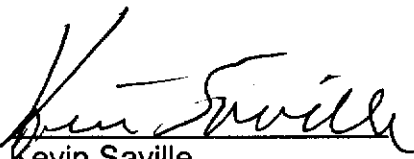


Kevin Saville

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(952) 491-5515 Fax
Counsel for Citizens
Telecommunications Company of Illinois

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the above Joint Petition, together with copies of the documents referred to therein, have been served upon the parties to whom the Joint Petition is directed by first-class mail, proper postage prepaid, from Mound, Minnesota, on the 30th day of December 2002.



Kevin Saville